



VIRGINIA
& AMBINDER LLP
Attorneys at Law

Conference adjourned from April 1, 2022 to
June 9, 2022 at 10:30 a.m. The conference will
proceed telephonically. Call-in information is:
Dial-In No.: 1-888-363-4749,
Access Code: 3667981#.
SO ORDERED.
Dated: 3/30/2022

40 Broad Street, 7th Floor
New York, New York 10004
Telephone: (212) 943-9080
Facsimile: (212) 943-9082

John M. Harras
Partner
jharras@vandallp.com

P. Kevin Castel
United States District Judge

March 29, 2022

VIA ELECTRONIC CASE FILING

Hon. P. Kevin Castel, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: **Trs. of the New York City District Council of Carpenters Pension Fund,
et al. v. Alite Flooring, LLC, et al.; Civil Action No.: 22 CV 0522 (PKC)**

Dear Judge Castel:

This firm represents Plaintiffs in the above-referenced action. Plaintiffs submit this letter, pursuant to Rule 1.B of the Court's Individual Practices, to respectfully request an adjournment *sine die* of the initial pretrial conference currently scheduled for April 1, 2022 in this action. (See ECF Doc. No. 8.)

On January 20, 2022, Plaintiffs commenced this action with the filing of a Complaint. (ECF Doc. No. 1). On January 25, 2022, Plaintiffs filed an Amended Complaint. (ECF Doc. No. 7). On January 26, 2022, Plaintiffs served Defendants with the Summons and Amended Complaint. (ECF Doc. Nos. 9-10). Since then, Defendants have neither appeared in this case nor responded to the Amended Complaint and their time to do so expired on February 16, 2022. (See *id.*). Based on Defendants' failure to appear in this case, Plaintiffs anticipate filing a motion for default judgment and have already filed a request for a certificate of default from the Clerk.

Accordingly, in light of Plaintiffs' imminent motion for default judgment, Plaintiffs respectfully request the Court adjourn the April 1, 2022 conference *sine die*. Plaintiffs could not reach Defendants to obtain their consent. This request is Plaintiffs' first such request.

Respectfully submitted,

John M. Harras

Hon. P. Kevin Castel, U.S.D.J.
United States District Court, S.D.N.Y.
March 29, 2022

cc: **VIA FIRST CLASS MAIL**

Alite Flooring, LLC
45 Route 46 East, Suite 604
Pine Brook, NJ 07058

Alite Floor LLC
100 Engle Rock Avenue, Suite 110
East Hanover, NJ 07936